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Proposed Counsel for Official  
Committee of Unsecured Creditors of  
Lehman Brothers Holdings Inc., et al.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
: :  
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)  
: :  
Debtors. : (Jointly Administered)  
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**MOTION UNDER LOCAL BANKRUPTCY RULE  
2090-1(b) FOR ADMISSION PRO HAC VICE**

Dennis C. O'Donnell ("Movant"), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States Bankruptcy Court for the Southern District of New York and of counsel in the financial restructuring group of Milbank, Tweed, Hadley & McCloy LLP ("Milbank"), hereby submits this motion (the "Motion") to this Court for an order permitting Robert Jay Moore (the "Admittee") to practice pro hac vice before the United States Bankruptcy Court for the Southern District of New York to appear and represent the Official Committee of Unsecured Creditors (the "Committee") of Lehman Brothers Holdings Inc., and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), under Rule 2090-1(b) of the Local Bankruptcy Rules of the Southern District of New York. In support of the Motion, the Movant respectfully represents as follows:

1. Admittee is a partner of Milbank, resident in Milbank's Los Angeles office and is a member of Milbank's financial restructuring group. Admittee is admitted to practice and in good standing in the bars of the State of California, the District of Columbia (Inactive Status), the U.S. Court of Appeals for the Ninth Circuit, and the U.S. District Court for the (i) Central, (ii) Northern, (iii) Eastern, and (iv) Western Districts of California.

2. Pursuant to the annexed certification, the Admittee submits to the disciplinary jurisdiction of this Court for any alleged misconduct, which occurs in the course of, or in the preparation of, this action. In addition, Admittee has access to, or has acquired, a copy of the Local Rules and is generally familiar with such rules.

3. Admittee agrees to pay a fee of \$25 on entry of an order granting admission to practice pro hac vice.

4. Admittee's office and e-mail addresses, and telephone and fax numbers are as follows:

Robert Jay Moore  
Milbank, Tweed, Hadley & McCloy LLP  
601 South Figueroa Street, 30<sup>th</sup> Floor  
Los Angeles, CA 90017  
Telephone: (213) 892-4501  
Facsimile: (213) 892-4701  
[rmoore@milbank.com](mailto:rmoore@milbank.com)

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WHEREFORE, the Movant respectfully requests that this Court enter and order permitting the Admittee to appear pro hac vice in association with the Movant as proposed counsel for the Committee in these chapter 11 cases.

Dated: New York, New York  
October 17, 2008

**MILBANK, TWEED, HADLEY & McCLOY LLP**

By: /s/ Dennis C. O'Donnell

Dennis F. Dunne (DD 7543)  
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Proposed Counsel for Official  
Committee of Unsecured Creditors of  
Lehman Brothers Holdings Inc., et al.

**CERTIFICATION**

The undersigned certifies that he is eligible for admission pro hac vice to this Court, is admitted to practice and in good standing in the bars of the State of California, the District of Columbia (Inactive Status), the U.S. Court of Appeals for the Ninth Circuit, and the U.S. District Court for the (i) Central, (ii) Northern, (iii) Eastern, and (iv) Western Districts of California, submits to the disciplinary jurisdiction of the Court for any alleged misconduct, which occurs in the course of, or in the preparation of, this action, and has access to, or has acquired, a copy of the Local Bankruptcy Rules for the Southern District of New York, and is generally familiar with such rules.

Dated: New York, New York  
October 17, 2008

**ROBERT JAY MOORE**

A handwritten signature in blue ink that reads "Robert Jay Moore". The signature is fluid and cursive, with "Robert" and "Jay" on the first line and "Moore" on the second line.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
In re: : Chapter 11  
:   
LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)  
:   
Debtors. : (Jointly Administered)  
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**ORDER GRANTING MOTION UNDER LOCAL BANKRUPTCY  
RULE 2090-1(b) FOR ADMISSION PRO HAC VICE**

ORDERED, that Robert Jay Moore, Esq., is admitted to practice pro hac  
vice in the above-captioned chapter 11 cases, in the United States Bankruptcy Court for  
the Southern District of New York, subject to payment of the filing fee.

Dated: New York, New York  
October \_\_\_\_, 2008

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THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE